From: ANDERSON Jim M
To: Chip Humphrey/R10/USEPA/US@EPA; Kristine Koch/R10/USEPA/US@EPA
Cc: GAINER Tom; TARNOW Karen E; POULSEN Mike; MCCLINCY Matt; PETERSON Jenn L
Subject: RE: Reminder - comments for EPA feedback on Dec 14th LWG presentations
Date: 01/13/2011 04:52 PM

Chip & Kristine,

Here are DEQ's comments on the 4 specific subjects the LWG presented at the 12/14/10 check-in meeting.

Preliminary Capping & Isolation Evaluation Presentation

1) Big Picture- do we agree with the results of the evaluation?- We generally agree with LWG's approach & results. We agree with the LWG's point that capping shouldn't be screened-out over large portions of the site with low levels of contamination.

2) Did the LWG do the appropriate evaluation for a screening-level analysis?- Yes.

3) What specific changes to the evaluation are needed?-

a) Cap TZW (Slides 5, 7)- The LWG's recommended approach ("Guidance-based Application Points") doesn't call for any TZW sampling in the cap. We realize you're looking for some feedback from Steve Ells & others re: this precedence.

However, let's assume…, for simplicity…, the cap doesn't have an "optional armor layer". With that assumption, the LWG recommends 2 things. **1st**, the compliance standards would be fish consumption AWQC, chronic AWQC, & "MCLs in areas with contaminated groundwater plumes". Our continuing concern with this 1st point is that if we have clean groundwater discharging to the river thru contaminated sediment…, the LWG should still screen using MCLs. **2nd**, while we generally agree with the LWG's proposed points of compliance for fish consumption AWQC & MCLs, we don't agree the point of compliance for chronic AWQC should

be “surface water concentrations immediately above the sand cap”. That point of compliance is not necessarily protective of burrowing benthos. We think the LWG would argue we don’t need cap TZW because we can rely on cap bulk sediment results to evaluate potential toxicity to burrowing benthos.

b) Fish consumption criteria (Slide 6)-The LWG mentions comparing fish consumption criteria to water column concentrations that account for people consuming fish over large areas. We found from the pan-fishers that sometimes people catch & consume fish in Portland Harbor from very localized & consistently used areas (that’s because that’s where the fish are &/or that’s where the ready access is).

Preliminary Methods for Volume Determination

1) Big Picture- do we agree with the results of the evaluation?- We generally agree with LWG’s approach & results. However, dredging around docks/structures should not be screened out over large portions of the site with high levels of contamination. Rather, a than harbor-wide rule to screen docks/structures out, this determination should be made a SMA-specific basis. It is not clear if the proposed screening related to docks/structures is strictly for initial harbor-wide volume determination or if such screening would carry through the entire FS. If such dredging is screened out in the FS, it is not clear if this topic would be re-evaluated during remedial design.

2) Did the LWG do the appropriate evaluation for a screening-level analysis?- Yes.

3) What specific changes to the evaluation are needed?-

a) Dock demolition (Slide 2)- We agree with EPA’s stated opposition to the LWG’s conclusion “Demolition/reconstruction of structures is cost prohibitive & can be ‘pre-

screened' from further consideration."

b) Diver-assisted dredging (Slide 20)- The LWG should consider focused driver-assisted dredging in hot-spot areas not amenable to traditional dredging options (e.g., around docks).

c) Dilapidated docks (Slide 22)- We understand the huge cost of remedial actions around dock structures, & we also understand how many owners may want to maintain established sites for future needs, but there are a number of dilapidated docks in Portland Harbor that should be repaired or removed. They often pose a safety hazard & an overwater source of contamination. An example is the unused, unsafe, dilapidated dock at the downstream portion of the Gunderson site.

Disposal Site Screening Evaluation

1) Big Picture- do we agree with the results of the evaluation?- We generally agree with the LWG's approach & results.

2) Did the LWG do the appropriate evaluation for a screening-level analysis?- Yes.

3) What specific changes to the evaluation are needed?-

a) General viability of CAD (Slide 7)- It seems a stretch…, especially to the public…, to consider dredging highly contaminated bedded sediment, & disposing of that sediment in the river…, even under conservative, protective design. Ross Island is a unique situation that may be an exception. We agree CADs should be identified in the alternative screening process, but it important to note the concerns with their general viability.

b) Ross Island assumptions (Slide 21)- We

agree with EPA's statement that the LWG should provide additional detail on their Ross Island CAD assumptions.

PRG & SMA Mapping Uncertainty Analysis

-Chip & Kristine, we understood that EPA didn't want comments on this 4th presentation item, & that we would defer consideration & discussion to a later time. Suffice it to say that the 1 specific example the LWG presented 12/14 ("*Example SMA Mapping Analysis-Detection Limit Assumptions*", Slides 18-21) was not accepted by EPA/partners.

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Chip & Kristine, there's 1 other concept that hasn't been discussed very much in the Portland Harbor FS that I think it's very important & we want to make sure it's considered: net risk reduction. Often people think the best remedy is the remedy that removes the greatest amount (mass) of contamination. However, the best remedy is the remedy that best reduces the risk to human & the environment. The concept of net risk reduction gets to the issue of whether the remedial action reduces or increases overall risk. For example, if sediment contamination is currently buried beneath cleaner sediment & that buried sediment is not subject to possible erosion…, does it make sense to dredge that buried sediment. The simple act of dredging may introduce more contamination into the river than leaving it in place. Net risk reduction gets at the questions of implementation risk (what risk does the remedial action itself pose) & residual risk (what risk does the contamination pose if left in-place). We need to consider net risk reduction during the PH Feasibility Study.

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-----Original Message-----
From: Humphrey.Chip@epamail.epa.gov
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Sent: Wednesday, January 05, 2011 2:15 PM
To: Shephard.Burt@epamail.epa.gov; GAINER Tom; Grepo-Grove.Gina@epamail.epa.gov; PETERSON Jenn L; jeremy_buck@fws.gov; ANDERSON Jim M; Goulet.Joe@epamail.epa.gov; Smith.Judy@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; MCCLINCY Matt; POULSEN Mike; Fuentes.Rene@epamail.epa.gov; Robert.Neely@noaa.gov; Sheldrake.Sean@epamail.epa.gov; tomd@ctsi.nsn.us; rose@yakama.com; erin.madden@gmail.com; jay.field@noaa.gov; Cora.Lori@epamail.epa.gov; Ader.Mark@epamail.epa.gov; audiehuber@ctuir.com; Lisa.Bluelake@grandronde.org; Benjamin Shorr; LavelleJM@cdm.com; Mary.Baker@noaa.gov; Michael.Karnosh@grandronde.org; FARRER David.G; dallen@stratusconsulting.com; jpeers@stratusconsulting.com; Bob Dexter; cunninghame@gorge.net; JMalek@parametrix.com; nancy.munn@noaa.gov; jweis@hk-law.com; Brad Hermanson; frenchrd@cdm.com; ryan@davissudbury.com; Genevieve.Angle@noaa.gov; TARNOW Karen E; Jessica.Winter@noaa.gov; mspence@parametrix.com; Allen.Elizabeth@epamail.epa.gov; colin@ridolfi.com; AEbbets@stratusconsulting.com; DBeltman@stratusconsulting.com; Gustavson.Karl@epamail.epa.gov
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Subject: Reminder - comments for EPA feedback on Dec 14th LWG presentations

Now that we've all settled (hopefully) into the new year, one of our

highest priorities (in addition to the benthic approach) is to provide

feedback to the LWG on the topics that they did cover at the December

14th FS check-in meeting. As follow-up to the FS check-in meeting on

December 14th and the internal team meeting on the December 15th, we

decided that EPA would send a letter to the LWG with direction on moving

forward with the FS, and provide feedback on the 4 specific subjects

that were presented at the check-in meeting by mid-January.

EPA sent the FS direction letter to the LWG on Dec 21st. The LWG

subsequently requested a 30 day extension (until February 3rd) of the

deadline to dispute the direction in our letter. EPA determined that a

14 day extension of the deadline was acceptable, and the new deadline is

January 18th.

Please provide any comments by January 13th on the following LWG

presentations. Copies of the presentation slides were provided in

Eric's email dated December 9, 2010.

- Preliminary capping chemical isolation evaluation

- Preliminary methods for volume determinations

- Disposal site screening evaluation

- PRG and SMA mapping uncertainty analysis

The focus of the comments should be: 1) to provide feedback and further

direction to the LWG, and 2) identify issues raised by the presentations

that need to discussed internally

- Big picture - do we agree with the results of the

evaluations?

- Did the LWG do the appropriate evaluation for a screening level

analysis? for the draft FS?

- What specific changes to the evaluations are needed?

We had a chance to discuss some initial observations on the 4

presentations during our follow-up meeting on the December 15th - they

shouldn't eliminate capping in the low concentrations areas at the

screening step based on the cap model runs, shouldn't screen out

demolition of structures at all locations, and should provide additional

detail on their Ross Island assumptions, etc. We'll pull together the

notes from that meeting as part of our comment preparation. We already

provided our general reaction (in the Dec 21st letter) to the

uncertainty analysis, but should include additional comments, including

on the one specific example (detection limits) that was presented.

thanks in advance, and to Karl and Doug for getting the comments started

Chip